

March 22, 2019

VIA ECF

Honorable Lorna G. Schofield United States District Judge Southern District of New York 40 Foley Square New York, NY 10007

Re:

Samuels v. Bobbitt et al

Civil Action No.: 1:19-cv-00576-LGS

JOINT LETTER RE SERVICE OF PROCESS AND DEFENDANTS' TIME TO FILE AN ANSWER

Dear Honorable Lorna G. Schofield:

The parties write jointly to respectfully request an extension of Defendants' time to file an Answer. Both Defendants Philip Bobbitt and Maya Bobbitt accepted personal service of the summons and complaint on March 21, 2019. During the initial conference, Your Honor recommended that the parties engage in mediation using a mediator from the SDNY's mediation panel. The tentative date for the mediation is scheduled for May 24, 2019, subject to Maya Bobbitt's potential pregnancy-related hospital visits.

Accordingly, the parties respectfully request that the Defendants' time to Answer or otherwise move with respect to Plaintiff's Complaint be extended up to and including June 5, 2019, so that Defendants may preserve resources for the potential settlement of this matter. Defendants agree to waive any defenses as to insufficient service of process.

Respectfully submitted,

PARDALIS & NOHAVICKA, LLP

/s/Ariadne Panagopoulou

Ariadne Panagopoulou

Counsel for the Plaintiff

Philip Bobbitt

Pro Se Defendant

Maya Bobbitt

Pro Se Defendant